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C.H. ROBINSON WORLDWIDE, INC.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

ALLEN M. MILLER,

Plaintiff,

v.

C.H. ROBINSON WORLDWIDE, INC.,
RONEL R. SINGH, RHEAS TRANS, INC.,
And KUWAR SINGH dba RT SERVICE,

Defendants.

Case No.: 3:17-cv-00408-MMD-CLB

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE JOINT
PRETRIAL ORDER**

(First Request)

Pursuant to Local Rule IA 6-1 and 7-1, the parties, by and through their respective counsel, stipulate and request that the Court extend the deadline for Plaintiff Allen M. Miller and Defendant C.H. Robinson Worldwide, Inc. ("CHR") to file the Joint Pretrial Order pursuant to LR 16-3.

On March 31, 2021, this Court entered its Order reopening limited discovery and setting certain dates for dispositive deadlines (ECF No.121). Pursuant to said Order, the Parties were Ordered, "The joint pretrial order shall be filed no later than Friday, July 30, 2021, or 30 days after the decision of any pending dispositive motions." (ECF No. 121). Thereafter, CHR filed its Motion for Summary Judgment on June 25, 2021 (ECF No. 124). After full briefing and consideration by this Honorable Court, CHR's Motion for Summary Judgment was denied on February 22, 2022 (ECF No. 142). Thus, pursuant to this Court's prior Order (ECF No. 121), the Parties' Joint Pretrial Order would be due on March 24, 2022. For the reasons stated below, and

1 in good faith, the Parties hereby stipulate to continue the deadline by three weeks, from March 24,
2 2022 to April 14, 2022.

3 This is the first stipulation for extension of time to file a response and reply for the Motion.
4 Counsel for Defendants have several work and family matters requiring travel from March 19,
5 2022 through March 27, 2022. Further, counsel for the Plaintiff will be in a Federal Jury Trial
6 expected to commence on March 21, 2022 in West Virginia. Therefore, to provide time to fully
7 and properly provide the information required of a Joint Pretrial Order under LR 16-3, the Parties
8 respectfully request this extension.

9 Counsel have begun discussion of the proposed Final Pretrial Order and in Part IX, counsel
10 will be offering the following three (3) jointly available trial dates: November 28, 2022; December
11 12, 2022 and January 9, 2023 should the Court wish to hold or set trial dates before receiving
12 counsel's proposed Final Pretrial Order.

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This request is made in good faith and not for the purpose of delay.

DATED: March 10, 2022

By: /s/ Michael Sullivan

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Attorneys for Defendant C.H. Robinson Worldwide, Inc.


By: /s/ Michael Leizerman

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Attorneys for Plaintiff Allen M. Miller

IT IS SO ORDERED.



UNITED STATES DISTRICT JUDGE
UNITED STATES MAGISTRATE JUDGE
Dated: March 14, 2022

CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I certify that I am an employee of ROBISON, SHARP, SULLIVAN & BRUST, and that on this date I caused to be served a true copy of the attached **STIPULATION AND ORDER TO EXTEND TIME TO FILE JOINT PRETRIAL ORDER (First Request)** on all parties to this action by the method(s) indicated below:

_____ by placing an original or true copy thereof in a sealed envelope, with sufficient postage affixed thereto, in the United States mail at Reno, Nevada, addressed to:

Michael Jay Leizerman, Esq.
Rena Mara Leizerman
THE LAW FIRM FOR TRUCK SAFETY, LLP
3450 W. Central Avenue, Suite 328
Toledo, OH 43606

Matthew L. Sharp, Esq.
432 Ridge Street
Reno, NV 89501

_____ by personal delivery/hand delivery addressed to:

_____ by email addressed to:

Michael Jay Leizerman, Esq.
michael@truckaccidents.com

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XX by using the Court's CM/ECF Electronic Notification System.

DATED this 14th day of March, 2022.

/s/ Blanca Driver
Employee of Robison, Sharp, Sullivan & Brust